

# PUBLIC SUBMISSION

<b>As of:</b> February 26, 2013
<b>Received:</b> February 19, 2013
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 1jx-83rw-12df
<b>Comments Due:</b> April 01, 2013
<b>Submission Type:</b> Web

**Docket:** NRC-2013-0021  
Availability of Draft Regulatory Guide

**Comment On:** NRC-2013-0021-0001  
Quality Assurance Program Requirements (Operations)

**Document:** NRC-2013-0021-DRAFT-0002  
Comment on FR Doc # 2013-02349

2/04/2013  
78FR 7816  
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## General Comment

See uploaded file.

## Attachments

Docket ID NRC-2013-0021 Comment on FRN on RV of 1.33 RE Endorsement of 3.2-2012 from DJS 2-19-13

SUNSI Review Complete  
Template = ADM - 013  
E-RIDS= ADM -03  
Add= P. Prescott (PFP)  
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## Standards Committee

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February 19, 2013

Ms. Cindy Bladey  
Rules, Announcements, and Directives Branch  
Office of Administration  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Dear Ms. Bladey:

RE: Comment on DG-1300 (Rev. RG 1.33) Federal Register Notice Docket ID NRC-2013-0021

The American Nuclear Society (ANS), specifically the ANS Standards Board Chair, is pleased to submit the following public comment on the Nuclear Regulatory Commission's (NRC's) recent issuance of:

**DRAFT REGULATORY GUIDE DG-1300**  
*(Proposed Revision 3 of Regulatory Guide 1.33, dated February 1978)*  
**QUALITY ASSURANCE PROGRAM REQUIREMENTS**  
**(OPERATION)**

This draft Regulatory Guide (RG) endorses the latest, 2012, edition of ANSI/ANS-3.2-2012, "Managerial, Administrative, and Quality Assurance Controls for Operational Phase of Nuclear Power Plants." This ANS-3.2 standard has been revised multiple times since its last endorsed edition of ANS-3.2 (ANSI N18.7-1976), "Administrative Controls and Quality Assurance for the Operational Phase of Nuclear Power Plants." A proposed Revision 3 of RG 1.33 was issued in 1983 in a post-Three Mile Island environment but was never completed.

This regulatory history is repeated herein to underscore the long awaited and timely endorsement by the NRC. The nuclear industry certainly will benefit from an up-to-date endorsement of a standard that has been revised six times in the past thirty-seven years reflecting a myriad of quality improvements for the industry. Over the intervening years, the ANS-3.2 standard has changed its format to more closely align with the 10 CFR Part 50, Appendix B, criteria and to reduce duplicative requirements defined elsewhere by referencing those requirements as applicable.

It is noted that the NRC recently endorsed American Society of Mechanical Engineers NQA-1-2008/2009 Addenda), "Quality Assurance Requirements for Nuclear Facility Applications," via RG 1.28 in 2010. Thus the industry now finds itself with two recently revised, nuclear standards for design & construction and for operations both of which will have received formal NRC endorsement. This truly is a "win-win" for the nuclear industry and the regulatory environment. A clear delineation of quality assurance requirements is now available for the new generation of plants as well as for consideration of existing licensees who may want to migrate to a consistent set of requirements for their fleet of reactors within their company.

The last two revisions of the ANS-3.2 standard were accomplished by working groups representing well over two-thirds of the operating reactors in the United States. This deliberate constitution of the working groups ensured that the latest and most effective quality requirements were described. It is also noted that this latest revision was accomplished by a working group that had considerable representation of members who also served on the Nuclear Energy Institute's Quality Assurance Task Force.

The American Nuclear Society (ANS) is pleased to have developed the subject standard that is now up for NRC endorsement. Similarly, the ANS is particularly pleased that the NRC has taken this proactive route leading to a stability in endorsed requirements that has not existed for over thirty years.

Please do not hesitate to contact me if you have any questions.

Respectfully yours,



Donald Spellman, Chair  
ANS Standards Board

DJS/chm

Cc: Michael L. Corradini, Ph.D., ANS President  
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Michael J. Case, NRC Standards Executive  
Paul F. Prescott, ANS-3.2 NRC Representative